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OCT 20 1992

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. John Patrick O'Malley Roux Associates, Inc. 1222 Forest Parkway No. 190 West Deptford, New Jersey 08051

Re: (2) RIN-2069 92

Dear Mr. O'Malley:

This is in response to your July 31, 1992 Freedom of Information Act (FOIA) request for the preliminary assessment and site inspection reports pertaining to Monsanto Company, Camden Plant, (Monsanto), located in 1500 Pine Street, Camden, New Jersey, EPA I.D. No.: NJD001700830.

A review of our files found a copy of a Resource Conservation and Recovery Act (RCRA) generator inspection report submitted by the New Jersey Department of Environmental Protection (NJDEP), dated June 4, 1981. On August 12, 1992, you were contacted by Richard Yue, of my staff, regarding the nature of your request. You stated that in your recent visit to the EPA, you have already obtained a copy of the aforementioned inspection report. Therefore, it was agreed that EPA will not be sending you another copy of the said report.

Enclosed is a copy of a draft Environmental Priority Initiative Preliminary Assessment report, and copies of documents related to the hazardous waste notification activities. Also enclosed is a bill for \$48.95 to cover the cost of compiling and reproducing the requested information.

If you have any questions regarding this matter, please contact Richard Yue, at (212) 264-9399.

Sincerely yours,

Andrew Bellina, P.E. Chief, Hazardous Waste Facilities Branch

Enclosures



bcc:

Andrew Bellina, 2AWM-HWF w/o encls.
Michael Poetzsch, 2AWM-HWF w/o encls.
Richard Yue, 2AWM-HWF w/o encls.
Wanda Vasques, 2EPD w/o encls.
Ronald Gherardi, 2OPM-FIN w/o encls.

2AWMD

8

B. Land Type

P

H

P

State

MO

C. Owner Type D. Change of Owner

800

ZIP Code

Yes No

314-694-1000

HTDOM

2100

A. Name of Installation's Legal Owner

Street, P.O. Box, or Route Number

Phone Number (area code and number)

800

City or Town

MONSANTO COMPANY

LEV

0 0

040193

(Date Changed) Month Day

0 0

Year

63167 -

•	ID - For Official Use Only
VIII. Type of Regulated Waste Activity (Mark 1997)	
VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. A. Hazardous Waste Activity	
1. Generator (See Instructions)	B. Used Oil Fuel Activities
a. Greater than 1000kg/mo (2.200 lbs.) b. 100 to 1000 kg/mo (220 - 2.200 lbs.) c. Less than 100 kg/mo (220 lbs.) 4. Hazardous Waste Fuel a. Generator Marketing to b. Other Marketers c. Burner - indicate device Type of Combustion Device Mode of Transportation 1. Air 2. Rail 3. Highway 4. Water 5. Other - specify IX. Description of Regulated Wastes (Use additional sheets if necessary) A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponwastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)	a. Generator Marketing to Burner b. Other Markerer C. Burner - indicate device(s) - Type of Combustion Device e(s) - evice 1. Utility Boiler 2. Industrial Burnace 3. Industrial Furnace e Corol (or On-site Burner) Who First Claims the Oil Meets the Specification
1. Ignitable 2. Corrosive 3. Reactive 4. EP Toxic	
(D002) (D003) (D000) (List specific EPA hazardo	ous waste number(s) for the EP Toxic contaminant(s))
B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33: See instructions if you need to	O list more than 12 years and a h
3 4	5 6
7 8 9 10	11 12
C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)	
Certification	5 6
I certify under penalty of law that I have personally examined and am fam and all attached documents, and that based on my inquiry of those obtaining the information, I believe that the submitted information is that there are significant penalties for submitting false information in the imprisonment.	"" " " " " " " " " " " " " " " " " " "
Name and Official Title (type or print) JEFFREY DIFFLORES	Date Signed
. Comments	- 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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example , Brown 18 on Comper Block 1505-01	, Lot 17 and Block 12C1
ote: Mail completed form to the appropriate EPA Regional or State Office. (Sae Sect	
A Form 8700-12 (01-90) Previous edition is obsolete2-	ion iii of the booklet for addresses.)

Monsanto

The Chemical Group 800 N. Lindbergh Boulevard St. Louis, Missouri 63167 Phone: (314) 694-1000

May 4, 1993

Norman Rost
Program Management Coordinator
USEPA - Region II
Air and Waste Management Division
26 Federal Plaza, Room 1006
New York NY 10278

Dear Mr. Rost:

Enclosed is the Notification of Waste Activity form which I had previously submitted. As requested in your letter of April 23, 1993, I have completed the form in its entirety rather than providing only the changed information.

Please call me at 314-694-4489 if you have any questions.

Sincerely,

Encl: 1

as

Jeffrey D. Felder, P.E. Site Operations Director



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

06/01/93

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->

NJD001700830

FACILITY NAME ->

MONSANTO CO

MAILING ADDRESS ->

PENNSYLVANIA AVE KEARNY, NJ 07032-0000

INSTALLATION ADDRESS ->

1500 PINE ST CAMDEN, NJ 08103-0000

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

ATTN: AIR & WASTE MANAGEMENT DIVISION, ROOM 1006 HAZARDOUS & SOLID WASTE PROGRAMS BRANCH RCRA NOTIFICATIONS

TO: BALAN, CELSO
SITE MGR
MONSANTO CO
PENNSYLVANIA AVE
KEARNY, NJ 07032-0000

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

SEPA

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the

CONTINUE ON REVERSE

INSTALLA-TION'S EPA I.D. NO. information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a MJD001700830 I. STALLATION MONSANTO CO* INSTALLA-TION MAILING ADDRESS 1500 FINE ST single site where hazardous waste is generated, CAMDEN, NJ treated, stored and/or disposed of, or a trans-porter's principal place of business. Please refer 08103 to the INSTRUCTIONS FOR FILING NOTIFI-CATION before completing this form. The information requested herein is required by law 1500 FINE ST III OF INSTAL-CAMBEN, NJ (Section 3010 of the Resource Conservation and 08103 Recovery Act). FOR OFFICIAL USE ONLY ATION'S EPA I.D. NUMBER APPROVED ADDRESS STREET OR P.O. BOX CITY OR TOWN ZIP CODE III. LOCATION INSTALLATION STREET OR ROUTE NUM IV. INSTALLATION CONTACT NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no.) TECHNICAL RICHARD SAVAGE SUPV 609 9 6 3 24 V. OWNERSHIP A. NAME OF INSTALLATION'S LEGAL OWNER 8 M ONS ANTO COMPANY B. TYPE OF OWNERSHIP (enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es)) A. GENERATION B. TRANSPORTATION (complete item VII) F = FEDERAL M = NON-FEDERAL M C. TREAT/STORE/DISPOSE D. UNDERGROUND INJECTION VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es)) A. AIR B. RAIL C. HIGHWAY D. WATER E. OTHER (specify): VIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below. C. INSTALLATION'S EPA I.D. NO X A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C) 0 DO 0 IX. DESCRIPTION OF HAZARDOUS WASTES

THE STATE OF THE STREET, AND ADDRESS OF THE				OOGTH	7008307
IX. DESCRIPTION OF	HAZARDOUS WAST	TES (continued from .	front)		14 16
A. HAZARDOUS WASTES waste from non-specific	FROM NON—SPECIFIC sources your installation	C SOURCES. Enter the n handles. Use additional	four—digit number from sheets if necessary.	n 40 CFR Part 261.31 f	or each listed hazardous
	2	3	4	5	6
23 - 25	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
.23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
B. HAZARDOUS WASTES specific industrial sources	FROM SPECIFIC SOUP s your installation handle	RCES. Enter the four—des. Use additional sheets	igit number from 40 CF if necessary.	R Part 261.32 for each	listed hazardous waste from
13	14	15	16	17	18
19	20	23 - 26	23 - 26	23 - 26	23 - 26 24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
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C. COMMERCIAL CHEMIC stance your installation h	CAL PRODUCT HAZAR landles which may be a h	DOUS WASTES. Enter azardous waste. Use add	the four-digit number ditional sheets if necessa	from 40 CFR Part 261.	33 for each chemical sub-
31	32	33	34	35	36
5223					
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
DEDE	HITT		40	41	42
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43	44	45	46	47	48
23 - 24	23 - 26				
D. LISTED INFECTIOUS W hospitals, medical and res	ASTES. Enter the four-	digit number from 40 (nstallation handles. Use	CFR Part 261.34 for each additional sheets if nec	ch listed hazardous wast	e from hospitals, veterinary
49	50	51	52	53	54
CHARACTERISTICS OF	NON LISTED HAZAE	23 - 26	23 - 26	23 - 26	23 - 26
E. CHARACTERISTICS OF hazardous wastes your ins	stallation handles. (See 4	10 CFR Parts 261.21 - 2	"X" in the boxes corres	sponding to the characte	eristics of non-listed
1. IGNITAB	LE (DO]2. CORROSIVE 02)	☐3. REAC (D003)	TIVE	4. TOXIC
C. CERTIFICATION				95 A A A A A A A A A A A A A A A A A A A	1-430
I certify under penalty attached documents, an I believe that the subminitting false information	itted information is t	rue accurate and co	mulate I		
IGNATURE	1		CIAL TITLE (type or p	rint)	DATE SIGNED
Will to		Plant	Manager		08/11/80

EPA Form 8700-12 (6-80) REVERSE

RP

I.D. - FOR OFFICIAL USE ONLY

NJD001700830

Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 694-1000

November 14, 1980

EPA - Region II Information Service Center 26 Federal Plaza New York, NY 10007

Gentlemen:

The enclosed application represents the best efforts of a number of Monsanto Company personnel to interpret and comply with the applicable regulations. As you know, while some of the provisions of the regulations implementing the Act are quite clear, other provisions have been difficult to interpret in specific situations. In several instances, clarification of the regulations, which had been expected from the EPA, were not forthcoming. In the absence of such clarifications, Monsanto Company personnel have acted in good faith in applying the regulations to specific situations in the most reasonable manner, in an effort to carry out the intent of the Act.

The application has been signed on behalf of Monsanto Company by a principal executive officer of at least the level of vice president, as required by 40 CFR §122.6. Please note, however, that any communications with Monsanto Company in connection with this application should be addressed (and will move much more rapidly if so addressed) as follows:

Plant Manager

Monsanto Co., Camden Plant 1500 Pine Street Camden, New Jersey 08103

Regards,

MONSANTO COMPANY

Clayton 7 Callis
Clayton F. Callis, Director
Environmental Operations &
Technology Planning

CFC/cm Enclosure

a unit of Monsanto Company

Ans-

CERTIFIED MAIL RECEIPT RECEIPT REQUESTED

Mr. John Patrick O'Malley Roux Associates, Inc. 1222 Forest Parkway No. 190 West Deptford, New Jersey 08051

Re: (2) RIN-2069 92

Dear Mr. O'Malley:

This is in response to your July 31, 1992 Freedom of Information Act (FOIA) request for the preliminary assessment and site inspection reports pertaining to Monsanto Company, Camden Plant, (Monsanto), located in 1500 Pine Street, Camden, New Jersey, EPA I.D. No.: NJD001700830.

On August 11, 1980, Monsanto submitted a Notification of Hazardous Waste Activity to the Environmental Protection Agency (EPA) indicating that they are a generator of hazardous waste, and a treatment, storage, and disposal (TSD) facility. However, on January 11, 1983, Monsanto stated that there is a generator of hazardous waste only; they have erroneously filled out the Notification of Hazardous Waste Activity form as also being a TSD facility. On February 18, 1983, EPA declassified Monsanto from a TSD facility to a hazardous waste generator facility.

After conducting a review of our files, a preliminary assessment to determine releases from solid waste management units (SWMUs) was not performed at this facility during the years 1980 and 1989. However, a Resource Conservation and Recovery Act (RCRA) generator inspection was performed at this facility on April 27, 1981, by representatives from the New Jersey Department of Environmental Protection and Engery (NJDEPE). A copy of a RCRA Generator Inspection Form report was received by EPA on June 4, 1981.

As per your recent conversation with Richard Yue, of my staff, on August 12, 1992, you stated that you have already obtained a copy of the aforementioned RCRA Generator Inspection Form report. Since you have a copy of the inspection report, it was agreed that EPA will not be sending you another copy of the inspection report. However, in addition, to your July 31, 1992 FOIA request for preliminary assessment and site inspection reports, you would also like information and correspondence regarding Monsanto's hazardous waste notification activities. Enclosed, please find a information related to Monsanto's hazardous waste notification activities.

the Canden Site

Conts: Mila

Since
it was
determined
that
the Camder
Site
is not
regulated
under
RCRA
correction
action
regularists

If you have any questions regarding this matter, please contact Richard Yue, at (212) 264-9399.

Sincerely yours,

Andrew Bellina, P.E. Chief, Hazardous Waste Facilities Branch

Enclosures

bcc: Andrew Bellina, 2AWM-HWF w/o encls.
Michael Poetzsch, 2AWM-HWF w/o encls.
Richard Yue, 2AWM-HWF w/o encls.
Wanda Vasques, 2EPD w/o encls.
Ronald Gherardi, 2OPM-FIN w/o encls.
2AWMD



Mr. J. Patrick O'Malley
Roux Associates, Inc.
1222 Forest Parkway #190
West Deptford, New Jersey

Re: (2) RIN-2069 92

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08051

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If you have any questions regarding this matter, please contact Richard Yue, at (212) 264-9399.

Sincerely yours,

Hazardous Waste Facilities Branch

bcc: Andrew Bellina, 2AWM-HWF WD Ind.
Michael Poetzsch, 2AWM-HWF WD Ind.
Richard Yue, 2AWM-HWF WD word.

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I. POLLUTANT CHARACTER	RISTICS				which this data is collected.			
questions, you must submit the supplemental form is at is excluded from permit require	A through J to determine his form and the supplement tached. If you answer "no rements; see Section C of the	whetintal for to o	her yo orm I each o ructio	ou need to isted in to question, ons. See all	o submit any permit application forms to the EPA. If you ans he parenthesis following the question. Mark "X" in the box in you need not submit any of these forms. You may answer "no so, Section D of the instructions for definitions of bold—faced	wer " the ti	'yes" hird o	to any column activity
SPECIFIC QUI	ESTIONS	-	MAR	FORM ATTACHE	Taced	term	S.	K 'X'
A. Is this facility a publicly which results in a discharge (FORM 2A)	owned treatment works	-	110	ATTACHE	B. Does or will this facility (cishes and cishes and ci	YES		FOR
			X	NA	aguatic animal production facilities animal reeding operation or		X	NZ
to waters of the U.S. othe	rently results in discharges er than those described in	16	17 X	NIA.	D. Is this a proposed facility (other thank)	19	20	21
Does or will this facility		22		NA 24	waters of the U.S.? (FORM 2D)	25	X 26	NA 27
hazardous wastes? (FORM 3	store, or dispose of	X		Х	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing within one			47
Do you or will you inject at	this facility any produced	28	29	30	underground sources of drinking water? (FORM 4)	31	X 32	NA 33
water or other fluids which in connection with conventi- duction, inject fluids used	are brought to the surface		х	NA	H. Do you or will you inject at this facility fluids for spe- cial processes such as mining of sulfur by the Frasch			
hydrocarbons? (FORM A)	fluids for storage of liquid	34	35	36	process, solution mining of minerals, in situ combus- tion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	NA
Is this facility a proposed sone of the 28 industrial castructions and which will p	otentially amit 100				J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will	37	38	39
Clean Air Act and may aff			X	NA	per year of any air pollutent regulated with 250 tons	184		
NAME OF FACILITY		40	41	42	Air Act and may affect or be located in an attainment area? (FORM 5)	43	X	NA 45
MONSANT	o co		T	111				
FACILITY CONTACT						9		
^	NAME & TITLE (last, firs	t, & t	itle)	101355	B. PHONE (area code & no.)			
A. V. AG.E., R. IC		E C	H.	SU	P.V. 6099630243			
ACILITY MAILING ADDRES	The state of the s				45 86 - 48 49 - 51 52 - 55			
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•	31				44			
AMDEN	CITY OR TOWN	17		111	C.STATE D. ZIP CODE			
FACILITY LOCATION			OVE.		40 41 42 08 1 03			
	OUTE NO. OR OTHER SPE	CIE	CIP	NE	51		1965	
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M D E N	CITY OR TOWN			70				

	prity)
A. FI	
28 1 9	INORGANIC CHEMICALS 7 2 8 1.6 LAMPBLACK (EXCLUDING FURNACE PROCE
28.9.5 (specify) LAMPBLACK ((FURNACE PROCESS) (specify)
OPERATOR INFORMATION	
MONSANTO COMPANY	A. NAME A. NAME B. Is the name list item VIII-A also owner? X YES
C STATUS OF OPERATOR (FM	ster the appropriate letter into the answer box; if "Other", specify,) D. PHONE (area code & no.)
= FEDERAL M = PUBLIC (= STATE O = OTHER (a = PRIVATE	(other than federal or state) (specify) P (specify) A 3 1 4 6 9 4 1 0 0 (
0 NORTH LINDBERGH	BLVD
F. CIT	Y OR TOWN G.STATE H. ZIP CODE IX. INDIAN LAND
ST LOUIS	MO 63 166 Is the facility located on Indian lands? MO 63 166 YES X NO
KISTING ENVIRONMENTAL PER	
A. NPDES (Discharges to Surface V	
NA .	9 P NA
B. UIC (Underground Injection of F	30 15 16 17 18 - 30 Fluids) E. OTHER (specify)
NA .	9 NA (specify)
17 18 -	30 15 16 17 18 30
C. RCRA (Hazardous Wastes)	E. OTHER (specify)
N.A.	9 NA
outline of the facility, the loca	raphic map of the area extending to at least one mile beyond property bounderies. The map must show ation of each of its existing and proposed intake and discharge structures, each of its hazardous waste silities, and each well where it injects fluids underground. Include all springs, rivers and other surface
atment, storage, or disposal fac- ter bodies in the map area. See in	nstructions for precise requirements.
atment, storage, or disposal fac- ter bodies in the map area. See in	nstructions for precise requirements.
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Atment, storage, or disposal facter bodies in the map area. See in NATURE OF BUSINESS (provide a Manufacture of L Bone Ash (natura a Bone Ash (natura certify under penalty of law that achments and that, based on no polication, I believe that the info	instructions for precise requirements. brief description ampblack, Phos Chek P/30 (insoluble ammonium polyphosphate). 1), and Mould Coat (synthetic Bone Ash, a hydroxyapatite). F9. A to I have personally examined and am familiar with the information submitted in this application and all my inquiry of those persons immediately responsible for obtaining the information contained in the termation is true, accurate and complete. I am aware that there are significant penalties for submitting sibility of fine and imprisonment. B. SIGNATURE Group Ing Director
Manufacture of L Bone Ash (natura CERTIFICATION (see instructions) ertify under penalty of law that achments and that, based on no polication, I believe that the info se information, including the postarle H. Harbison, Jr., ice President & Managi	instructions for precise requirements. brief description ampblack, Phos Chek P/30 (insoluble ammonium polyphosphate). 1), and Mould Coat (synthetic Bone Ash, a hydroxyapatite). F9. A to I have personally examined and am familiar with the information submitted in this application and all my inquiry of those persons immediately responsible for obtaining the information contained in the termation is true, accurate and complete. I am aware that there are significant penalties for submitting sibility of fine and imprisonment. B. SIGNATURE Group Ing Director

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CONTINUE ON REVERSE

PAGE 1 OF 5

4

EPA Form 3510-3 (6-80)

Co	ntinued from	the front.			
11	. PROCESSI	ES (continued)	A ALTON	STATE OF THE PARTY	The state of the s
2.	SPACE FOR A	ADDITIONAL PROCESS CODES SIGN CAPACITY.	OR FOR	DESCRIBING OTHER PROCESSES (c	ode "T04"). FOR EACH PROCESS ENTERED HERE
V.	DESCRIPT	ION OF HAZARDOUS WAST	TES		
		DOUS WASTE NUMBER — Enter ous wastes which are not listed in toxic contaminants of those haza			D for each listed hazardous waste you will handle. If you r(s) from 40 CFR, Subpart C that describes the characteris-
		ANNUAL QUANTITY — For each characteristic or toxic contaminant that characteristic or contaminant		aste entered in column A estimate the in column A estimate the total annual	quantity of that waste that will be handled on an annual quantity of all the non-listed waste(s) that will be handled
				umn B enter the unit of measure code	Units of measure which must be used and the appropriate
	E	NGLISH UNIT OF MEASURE		CODE METRIC UN	IT OF MEASURE CODE
		OUNDS		T METRIC TO	S
li a	f facility record	rds use any other unit of measure propriate density or specific gravit	e for quant ty of the w	titu the units of management	erted into one of the required units of measure taking into
	ROCESSES PROCESS O	CODES:			
	For listed h	azardous waste: For each listed	hazardous ted, and/or	waste entered in column A select the disposed of at the facility	code(s) from the list of process codes contained in Item III
	contained in	THO DAZAFOOLIS Wastes! For pach	charantario	thin on touch mantanting	slumn A, select the code/s/ from the list of process codes spose of all the non-listed hazardous wastes that possess
	Note: Fou	r spaces are provided for entering	na process	codes. If more are needed: (1) Enter space provided on page 4, the line num	
2					ocess in the space provided on the form.
OT	E: HAZARD	OUS WASTES DESCRIBED BY Hazardous Waste Number shall be	MORE TH	IAN ONE EDA HAZADDONO WACES	NUMBER — Hazardous wastes that can be described by
1.	Select one of	of the EPA Hazardous Waste Num	bers and er	nter it in column A. On the same line co	mplete columns B,C, and D by estimating the total annual
3,	"included w	ith above" and make no other ent	tries on the		to describe the waste. In column D(2) on that line enter
XA	MPLE FOR C	OMPLETING ITEM IV (shown i	n lina num	hora VI V2 V2	
e ce	orrosive only	and there will be an estimated 20	00 nounds	g operation. In addition, the facility will per year of each waste. The other was nerator and disposal will be in a landfill.	treat and dispose of three non-listed wastes. Two wastes
4	A. EPA HAZARD.	B. ESTIMATED ANNUAL	C. UNIT	REAL PROPERTY AND ADDRESS OF THE PERSON	D. PROCESSES
NO	(enter code)	QUANTITY OF WASTE	(enter	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))

T 0 3 D 8 0

T 0 3 D 8 0

T 0 3 D 8 0

PAGE 2 OF 5

P

P

K 0 5 4

D 0 0 2

D 0 0

D 0 0

A Form 3510-3 (6-80)

900

400

100

2. PROCESS DESCRIPTION (if a code is not entered in D(1))

included with above

CONTINUE ON PAGE 3

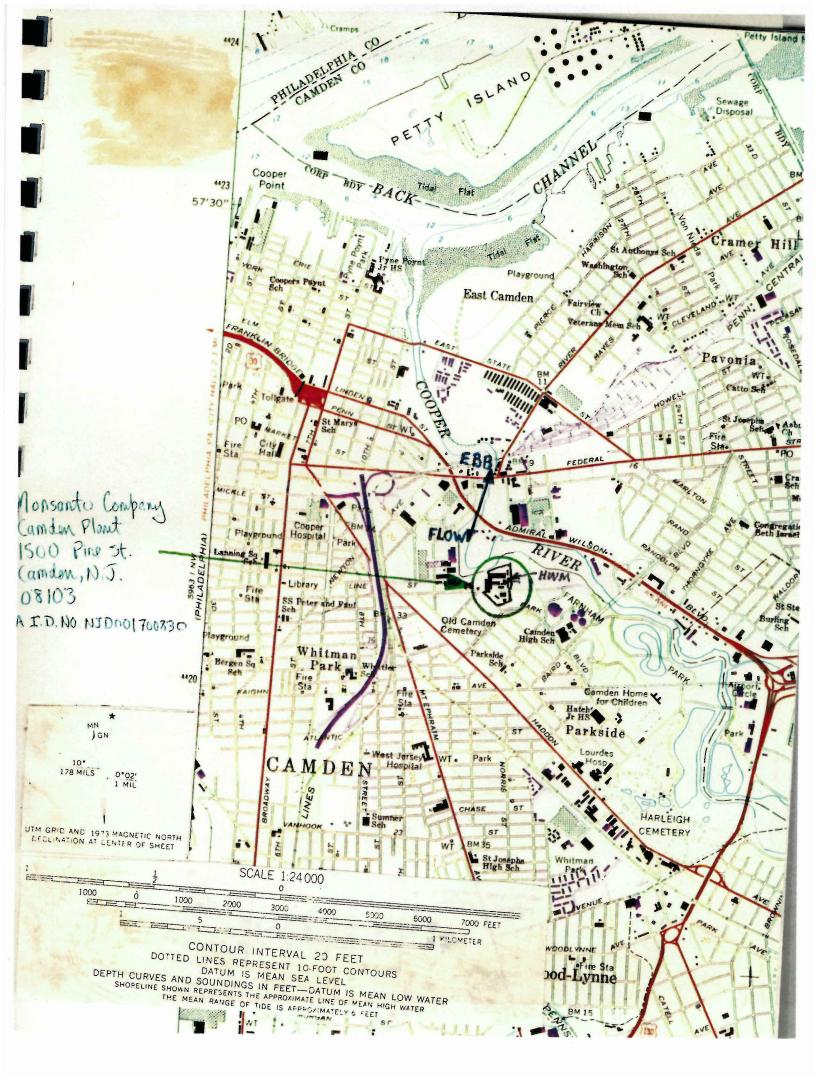
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	A	F6:56		
EPA I.D. NO. (enter from page 1)	6:55	16:56		
JD00170083036	3			
FACILITY DRAWING	表现成功的	THE PARTY NAMED IN	THE RESERVE	CHARLE LE
existing facilities must include in the space provided on	page 5 a scale drawin	g of the facility (see instructions	for more detail).	STATE OF THE PARTY
PHOTOGRAPHS	APPER AND	美国国际国际	100000000000000000000000000000000000000	
existing facilities must include photographs (aeri atment and disposal areas; and sites of future stor				
FACILITY GEOGRAPHIC LOCATION	rage, treatment of	disposar areas face matricetron	is for more actum	THE RESERVE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TW
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THE PART OF THE PA	CORP. No. of Section		74 75 76 77	- 79
	listed in Section VIII	on Form 1 "General Information	74 75 76 77	the box to the left and
A. If the facility owner is also the facility operator as I skip to Section IX below.	listed in Section VIII	on Form 1, "General Informatio	74 75 76 77 on", place an "X" in	the box to the left and
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A. If the facility owner is also the facility operator as I skip to Section IX below. B. If the facility owner is not the facility operator as I		on Form 1, complete the follow	ing items:	the box to the left and
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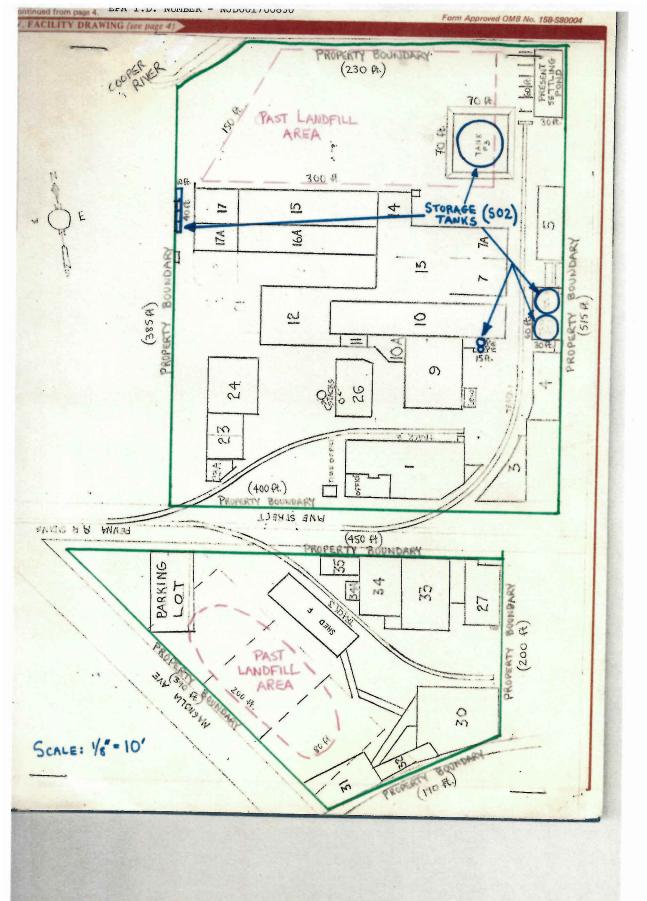
MONSANTO COMPANY

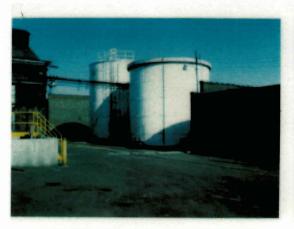
CAMDEN PLANT

RCRA

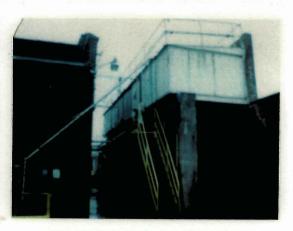
HAZARDOUS WASTE PERMIT APPLICATION







CEROTE 1000 CM DI AGE



MORSANTO COMPANY - CAMDEN, N.J. EPA I.D. NO NJDOO1700830



MONSANTS COMPANY - CAMOEN, N.J. EPA I.D. NO. NJD001700830



MONJANTO COMPANY - CANDEN, N.J. EPA J.D. NO. NJDOO! 700830

Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
1500 Pine Street Camden, New Jersey 08103

April 16, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

NJD 001 700 830

Mr. Edward Stevenson N. J. Department of Environmental Protection Office of Science and Research CN 402 Trenton, New Jersey 08625

Dear Mr. Stevenson:

TSCA SECTION 775.190 DIOXIN NOTIFICATION Reference: DATED - APRIL 15, 1985

After reviewing the EPA Form 8700-12 "Notification of EPA of Hazardous Waste Activity", dated April 15, 1985, the Hazardous Waste Code was inadvertently left off the reverse side. Attached is a revision including this Hazardous Waste Code. Please destroy your April 15th copy and replace with the attached.

Thank you for your understanding in this error.

Very truly yours,

MONSANTO COMPANY

C. Dieterich Plant Manager

DCD:mt

cc: U. S. EPA - Region II Water Division 26 Federal Plaza New York, NY 10278

EPA Form 8700-12 (6-80)

SEPA		ENVIRONMENTAL PRO ION OF HAZARD			IVITY	INSTRUCT		200			
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	T NOTIFICATION	B. SUBSEQU	JENT NOTIFI	CATION (complete ite	em C)	N J D	0 0	1 7 0		
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FRA Form 8700-1		p. ottos the requested to						CONT	INUE O	N REV	ERSE

	1. 1.			I.D FOR OI	FICIAL USE ONLY
				w	T/A C
-40 Harris					
IX. DESCRIPTION OF H	AZARDOUS WAS	TES (continued from	front/		
A. HAZARDOUS WASTES F waste from non—specific	ROM NON—SPECIFIC CONTROL OF THE PROPERTY OF T	C SOURCES. Enter the n handles. Use addition	e four-digit number from nal sheets if necessary.	m 40 CFR Part 261.31 fo	r each listed hazardous
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B. HAZARDOUS WASTES F specific industrial sources	ROM SPECIFIC SOUP your installation handle	RCES. Enter the four- es. Use additional shee	digit number from 40 Cl ts if necessary.	FR Part 261.32 for each I	isted hazardous waste from
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C. COMMERCIAL CHEMICA stance your installation has	L PRODUCT HAZAR	DOUS WASTES. Ente	r the four-digit number	from 40 CFR Part 261.3	3 for each chemical sub-
			dutional sheets in necess		
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	 	39	40	41	42
43	44	45	46	47	48
			 		
D. LISTED INFECTIOUS WA	STES. Enter the four-	-digit number from 40	CFR Part 261.34 for ea	ch listed hazardous waste	from hospitals, veterinary
49	50	1: :51	····		
Hil		1	52	53	54
		No.			
E. CHARACTERISTICS OF Nazardous wastes your insta	NON-LISTED HAZAF	RDOUS WASTES. Mar 40 CFR Parts 261.21 —	k "X" in the boxes corre	sponding to the characte	ristics of non—listed
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X. CERTIFICATION		· · · · · · · · · · · · · · · · · · ·		0 11 11	the same of the same
I certify under penalty attached documents, and I believe that the submit mitting false information,	l that based on my ted information is t	inquiry of those inc rue, accurate, and o	lividuals immediately complete. I am aware	responsible for obtain	ning the information
SIGNATURE /	***	NAME & OF	FICIAL TITLE (type or)	orint)	DATE SIGNED
Dater.		D. C.	Dieterich		04-15-85
, - 00		Dlant	Managor		04-12-62

EPA Form 8700-12 (6-80) REVERSE

Form Approved UMB No. 156-575016 GSA No. 0246-EPA-OT

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IX. DESCRIPTION OF					THE RESIDENCE OF THE PARTY OF T	
A. HAZARDOUS WASTES waste from non—specific				40 CFR Part 261.31 for	r each listed hazardor	us
HOW MAN THE	2	3	4	5	6	
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3. HAZARDOUS WASTES	EDOM SPECIFIC SOLIE	23 - 26	23 - 26	23 - 26	23 - 26	
specific industrial source	your installation handle	s. Use additional sheets	if necessary.	r Part 201,32 for each f	isted nazardous wasti	e from
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c. COMMERCIAL CHEMIC stance your installation h	CAL PRODUCT HAZAR andles which may be a h	DOUS WASTES. Enter azardous waste. Use add	the four—digit number litional sheets if necessa	from 40 CFR Part 261.3 iry.	3 for each chemical s	ub-
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D. LISTED INFECTIOUS W hospitals, medical and res					from hospitals, veter	rinary
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 CHARACTERISTICS OF hazardous wastes your in 	NON—LISTED HAZAF stallation handles. (See 4)	RDOUS WASTES. Mark 40 CFR Parts 261.21 — 2	"X" in the boxes corre	sponding to the characte	ristics of non-listed	
X 1. IGNITAL	BLE [2. CORROSIVE	☐3. REAC	TIVE	4. TOXIC	
(D001)	(DC		(D003)		(D000)	
C. CERTIFICATION		Call His Line	国际国际	IN SECOND PROPERTY.	ABDILLES.	2027
I certify under penalty attached documents, as I believe that the submitting false information	nd that based on my sitted information is	inquiry of those indi true, accurate, and co	viduals immediately mplete. I am aware	responsible for obtain	ning the informat	ion
IGNATURE (CIAL TITLE (type or p	print)	DATE SIGNED	
0 . 1				•		

EPA Form 8700-12 (6-80) REVERSE

REVISED

I.D. - FOR OFFICIAL USE ONLY

Monsanto

FRANCIS A. STROBLE Vice President-Finance & Chief Financial Officer Monsanto Company 800 N. Lindbergh Boulevard St. Louis, Missouri 63167 Phone: (314) 694-3092

June 17, 1982

Regional Administrator, Region II Environmental Protection Agency 26 Federal Plaza New York, New York 10007

Att: RCRA Financial Requirements

Gentlemen:

יידי ת יתת

I am the chief financial officer of Monsanto Company, 800 North Lindbergh Boulevard, St. Louis, Missouri 63167. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care, as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

EPA Facility		
I.D. No.	Name of Facility	Address of Facility
17 7 001700677		
AR D 001700657	Monsanto Company	P.O. Box 231
	El Dorado Plant	El Dorado, Arkansas 71730
LA D 001700756	Monsanto Company	P.O. Box 174
	Luling Plant	Luling, Louisiana 70070
IA D 990782112	Monsanto Company	R.R. #5
	Muscatine Plant	Muscatine, Iowa 52761
AL D 004019048	Monsanto Company	Highway 202
	Anniston Plant	West 10th Street
	Man town Hard TOME IO	Anniston, Alabama 36202
MO D 990712697	Monsanto Company	P.O. Box 8
	St. Peters Plant	St. Peters, MO 63376

		Facility .D. No.	Name of Facility	Address of Fooility
		.D. NO.	Name of Facility	Address of Facility
	CA O	063566517	Monsanto Company Oakmead Plant	Oakmead Industrial Court 3350 Scott Blvd., Bldg. 1 Santa Clara, CA 95051
	SC D	000419200	Monsanto Company Spartanburg Plant	Box 5397 Spartanburg, SC 29301
	TN D	00404814	Monsanto Company Columbia Plant	Columbia, Tennessee 38401
	CA D	990802738	Monsanto Company Avon Plant	1777 Monsanto Way Martinez, California 94553
	MO D	004954111	Monsanto Company J. F. Queeny Plant	1700 South Second Street St. Louis, Missouri 63177
	IL D	000802702	Monsanto Company W. G. Krummrich Plant	Route 3 Sauget, Illinois 62201
	TX D	001700806	Monsanto Company Chocolate Bayou Plant	Box 711 Alvin, Texas 77511
	TX D	008079527	Monsanto Company Texas City Plant	P.O. Box 1311 Texas City, Texas 77590
	GA D	001700699	Monsanto Company Augusta Georgia Plant	Marvin Griffin Road P.O. Box 1473 Augusta, Georgia 30903
$\sqrt{}$	NJ D	001700830	Monsanto Company Camden Plant	1500 Pine Street Camden, New Jersey 08103
	MO D	000006981	Monsanto Company Carondelet Plant	8201 Idaho Avenue St. Louis, Missouri 63111
V	NJ D	001700707	Monsanto Company Delaware River Plant	P.O. Box 296 Bridgeport, New Jersey
	MA D	990894172	Monsanto Company Everett Plant	Mystic View Road Everett, Maine 02149
√	NJ D	002444933	Monsanto Company Kearny Plant	Pennsylvania Avenue Kearny, New Jersey 07032
	OH D	071112239	Monsanto Company Montrose Mktg. & Tech. Center	260 Springside Drive Box 5444 Akron, Ohio 44313
	CA D	003938487	Monsanto Company Long Beach Plant	6251 Paramount Boulevard Box 2919 Long Beach, CA 90801

EPA Facility	NC T	
I.D. No	Name of Facility	Address of Facility
WV D 039990965	Monsanto Company Nitro Plant	Nitro West Virginia 25143
WA D 009282302	Monsanto Company Seattle Plant	9229 East Marginal Way S. Box 80963 Seattle, Washington 98108
MI D 009708678	Monsanto Company Trenton Plant	5045 West Jefferson Trenton, Michigan 48183
OH D 004233003	Monsanto Company Port Plastics Plant	River Road Addyston, Ohio 45001
MA D 041492406	Monsanto Company Bircham Bend Plant	190 Grochmal Avenue Indian Orchard, MA 01151
MA D 001114818	Monsanto Company Springfield Plant	730 Worcester Street Indian Orchard, MA 01151
MI D 074246919	Monsanto Company Trenton Resins Plant	5100 West Jefferson Trenton, Michigan 48183
AL D 006320774	Monsanto Company Decatur Plant	P.O. Box 2204 Decatur, Alabama 35602
FL D 000126169	Monsanto Company Pensacola Plant	P.O. Box 12830 Pensacola, Florida 32575
SC D 000419069	Monsanto Company Greenwood Plant	P.O. Box 1057 Greenwood, SC 29646
MO D 006266803	Monsanto Company Research Center	800 North Lindbergh St. Louis, Missouri 63166

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA Facility I.D. No.	Facility	Closure Cost Est. as of May 19, 1982 (Dollars in	Post- Closure Cost Est. as of May 19, 1982 Thousands)
OH D 004233003	Monsanto Company Port Plastics Plant River Road Addyston, Ohio 45001	\$ 62	\$ 0
OH D 071112239	Monsanto Company Montrose Mktg. & Tech. Ctr 260 Springside Drive Box 5444 Akron, Ohio 44313	3	0
LA D 001700756	Monsanto Company Luling Plant P. O. Box 174 Luling, La 70070	2,695	691
MI D 074246919	Monsanto Company Trenton Resins Plant 5100 West Jefferson Trenton, MI 48183	8	0
MI D 009708678	Monsanto Company Trenton Plant 5045 West Jefferson Trenton, MI 48183	225	1188
MO D 006266803	Monsanto Company Research Center 800 North Lindbergh St. Louis, MO 63166	50	0
MO D 000006981	Monsanto Company Carondelet Plant 8201 Idaho Avenue St. Louis, MO 63111	21	0
MO D 990712697	Monsanto Company St. Peters Plant P.O. Box 8 St. Peters, MO 63376	86	0
MO D 004954111	Monsanto Company J. F. Queeny Plant 1700 South Second Street St. Louis, MO 63177	414	0
NJ D 001700707	Monsanto Company Delaware River Plant P.O. Box 296 Bridgeport, NJ -4-	826	494

EPA Facility I.D. No.	Facility	Closure Cost Est. as of May 19, 1982 (Dollars in	Post- Closure Cost Est. as of May 19, 1982 Thousands)
NJ D 001700830	Monsanto Company Camden Plant 1500 Pine Street Camden, NJ 08103	\$ 7	\$ 0
NJ D 002444933	Monsanto Company Kearny Plant Pennsylvania Avenue Kearny, NJ 07032	3	0
WA D 009282302	Monsanto Company Seattle Plant 9229 East Marginal Way Box 80963 Seattle, WA 98108	27 South	0
WV D 039990965	Monsanto Company Nitro Plant Nitro, WV 25143	3,090	0
FL D 000126169	Monsanto Company Pensacola Plant P. O. Box 12830 Pensacola, FL 32575	3,224	0
TX D 001700806	Monsanto Company Chocolate Bayou Plant Box 711 Alvin, TX 77511	1,667	1,104
TX D 008079527	Monsanto Company Texas City Plant P. O. Box 1311 Texas City, TX 77590	662	90
GA D 001700699	Monsanto Company Augusta Georgia Plant Marvin Griffin Road P. O. Box 1473 Augusta, GA 30903	20	0
SC D 000419069	Monsanto Company Greenwood Plant P. O. Box 1057 Greenwood, SC 29646	10	0
SC D 000419200	Monsanto Company Spartanburg Plant Box 5397 Spartanburg, SC 29301	1	0
	,,		

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

			Post-
		Closure Cost	Closure Cost
EPA Facility		Est. as of	Est. as of
I.D. No	Facility	May 19, 1982	May 19, 1982
		(Dollars in	Thousands)
OH D 004855292	Monsanto Research Corp. P.O. Box 8, Station B Dayton, Ohio 45407	\$ 42	\$ 0

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

EPA Facility I.D. No.	Facility	Closure Cost Est. as of May 19, 1982	
TX D 001700806	Monsanto Company Chocolate Bayou Plant	(Dollars in \$1,667	\$1,104
	Box 711 Alvin, TX 77511		
TX D 008079527	Monsanto Company Texas City Plant P. O. Box 1311 Texas City, TX 77590	662	90
FL D 000126169	Monsanto Company Pensacola Plant P. O. Box 12830 Pensacola, FL 32575	3,224	0
GA D 001700699	Monsanto Company Augusta Georgia Plant Marvin Griffin Road P. O. Box 1473 Augusta, GA 30903	20	0

			Post-
		Closure Cost	Closure Cost
EPA Facility		Est. as of	Est. as of
I.D. No.	Facility	May 19, 1982	May 19, 1982
		(Dollars in	Thousands)
SC D 000419069	Monsanto Company Greenwood Plant P. O. Box 1057 Greenwood, SC 29646	\$ 10	\$ 0
SC D 000419200	Monsanto Company Spartanburg Plant Box 5397 Spartanburg, SC 29301	1	0

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility.

EPA Facility I.D. No.	Facility	Closure Cost Est. as of May 19, 1982 (Dollars in	
AL D 004019048	Monsanto Company Anniston Plant Highway 202 West 10th Street Anniston, AL 36202	\$ 340	\$ 895
AL D 006320774	Monsanto Company Decatur Plant P. O. Box 2204 Decatur, AL 35602	77	0
AR D 001700657	Monsanto Company El Dorado Plant P.O. Box 231 El Dorado, AR 71730	99	32
CA D 003938487	Monsanto Company Long Beach Plant 6251 Paramount Boulevard Box 2919 Long Beach, CA 90801	2	0

EPA Facility I.D. No.	Facility	Closure Cost Est. as of May 19, 1982 (Dollars in	Post- Closure Cost Est. as of May 19, 1982 Thousands)
CA D 990802738	Monsanto Company Avon Plant 1777 Monsanto Way Martinez, CA 94553	\$ 11	\$ 0
CA O 063566517	Monsanto Company Oakmead Plant Oakmead Industrial Court 3350 Scott Blvd., Bldg.1 Santa Clara, CA 95051	1	0
MA D 990894172	Monsanto Company Everett Plant Mystic View Road Everett, MA 02149	5	0
IA D 990782112	Monsanto Company Muscatine Plant R.R. #5 Muscatine, IA 52761	624	0
IL D 000802702	Monsanto Company W. G. Krummrich Plant Route 3 Sauget, IL 62201	2,037	0
MA D 041492406	Monsanto Company Bircham Bend Plant 190 Grochmal Avenue Indian Orchard, MA 01151	30	0
MA D 001114818	Monsanto Company Springfield Plant 730 Worcester Street Indian Orchard, MA 01151	49	0
TN D 00404814	Monsanto Company Columbia Plant Columbia, TN 38401	33	250
Subsidiaries			
IA D 005287768	Fisher Controls Int'l., Inc Marshalltown Division Governor Road Plant P. O. Box 190 Marshalltown, Iowa	c. 10	0

				1050	
		Closur	e Cost	Closure	Cost
EPA Facility		Est.	as of	Est. a	s of
I.D. No.	Facility	May 19	, 1982	May 19,	1982
				Thousands	
NC D 042891481	Monsanto Triangle Park Development Center, Inc. P. O. Box 12274 Res. Triangle Park, NC 2770	\$	35	\$	0

This owner or operator is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1981.

FINANCIAL TEST ALTERNATIVE I (Dollars in Millions)

1.	Sum of current closure and post-closure cost estimates	\$ 21.2
2.	Amount of annual aggregate liability coverage to be demonstrated	\$ 8.0
3.	Sum of lines 1 and 2	\$ 29.2
*4.	Total liabilities (if any portion of your closure or post-closure costs estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$ 2,739.0
* 5.	Tangible net worth	\$ 3,298.2
*6.	Net worth	\$ 3,330.2
* 7.	Current assets	\$ 2,549.5
*8.	Current liabilities	\$ 1,063.9
9.	Net working capital (line 7 minus line 8)	\$ 1,485.6
*10.	The sum of net income plus depreciation, depletion, and amortization.	\$ 806.2
*11.	Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$ 4,436.7

		YES	NO
12.	Is line 5 at least \$10 million?	_X	
13.	Is line 5 at least 6 times line 3?	_X	
14.	Is line 9 at least 6 times line 3?	_X	
*15 .	Are at least 90% of assets located in the U.S.? If not, complete line 16.	*******************************	<u>X</u>
16.	Is line 11 at least 6 times line 3?	<u>X</u>	
17.	Is line 4 divided by line 6 less than 2.0?	<u>X</u>	
18.	Is line 10 divided by line 4 greater than 0.1?	<u>X</u>	
19.	Is line 7 divided by line 8 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in $40~\mathrm{CFR}~264.151$ (g) as such regulations were constituted on the date shown immediately below.

Francis A. Stroble
Vice President and
Chief Financial Officer
June 17, 1982

Ten Broadway Saint Louis, Missouri 63102 (314) 231-1123 Telex 447638

Monsanto Company 800 North Lindbergh Boulevard Saint Louis, Missouri 63167 June 23, 1982

Dear Sirs:

We have examined the consolidated financial statements of Monsanto Company and subsidiaries for the year ended December 31, 1981 and have issued our report thereon dated February 26, 1982. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we compared the amounts specified in Mr. Francis A. Stroble's letter of June 17, 1982 as having been derived from the "independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1981" (the "specified amounts") with the corresponding amounts in the financial statements referred to in the preceding paragraph. In performing this procedure, no matters came to our attention that caused us to believe that the specified amounts should be adjusted.

Because this procedure would not constitute an examination in accordance with generally accepted auditing standards, we do not express an opinion on the specified amounts. In addition, we have performed no procedures with respect to any of the other information included in Mr. Francis A. Stroble's letter of June 17, 1982 and, accordingly, we express no opinion with respect to such information.

This report is submitted to you for your filing with the Regional Administrators of the Environmental Protection Agency under the Resource Conservation Recovery Act.

Velaitte Hardin & Selle

Youns truly,



001

LINO F. PEREIRA DEPUTY DIRECTOR

State of New Jerney

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON DIRECTOR

> Tech. Supervisor Richard Savage,

Monsanto Company 1500 Fine Street

BON ASIEWICZ Camden, NJ 08103

NOTICE OF VIOLATION

FAILURE TO SUBMIT ANNUAL REPORT

Dear Mr. Savage:

As a result of the information included in your company's RCRA Part A submittal to the USEPA, Region II, your hazardous waste activities were classified as a TSD (Treatment, Storage or Disposal) facility status. Pursuant to the provisions of the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1, et seq., the Department of Environmental Protection has determined by examination of our files that ment of Environmental Protection has determined by examination of our files that you failed to submit a TSD Facility Annual Report by March 1, 1982. The requirements of this report are given on the enclosed sheet (along with instructions on how to be delisted from TSD status). Please note that this report is different and separate from the Generator's Report referred to in N.J.A.C. 7:26-7.4(g).

NOW, THEREFORE, YOU ARE HEREBY NOTIFIED that your facility shall submit the required annual report within fifteen (15) days of receipt of this Notice to: Frank Coolick, Chief, Bureau of Hazardous Waste Engineering, 32 East Hanover Street, Trenton, New Jersey 08625.

BE ON NOTICE that the Solid Waste Management Act establishes penalties of up to \$25,000 per day for violation of the Department's hazardous waste management regulations. Your failure to correct the above violation, or any future violation, may result in a penalty action by this Department. Failure to submit the required report by the specified date will result in daily fines as follows:

During the first week after the deadline: \$100/day During the second week after the deadline: \$200/day During the third wek after the deadline: \$500/day ii.

During the fourth week after the deadline iii.

\$25,000/day and subsequently: a maximum of

If you have any questions regarding this Notice, please call the Bureau of Hazardous Waste Engineering at (609) 292-9880.

JAN 0 7 1993

David J. Shotwell, Chief

Bureau of Compliance and Eforcement

DJS:rh Enclosure

New Jersey Is An Equal Opportunity Employer

REPORTING AND RECORDKEEPING FOR TSD FACILITY AND REPORT PURSUANT TO N.J.A.C. 7:26-7.6(f)2.

The owner or operator must prepare and submit two copies of an annual report to the Department by March 1 of each year. The report must include:

- i. the EPA Identification Number, name and address of the facility.
- ii. the calendar year covered by the report.
- iii. a compilation of the daily operating record kept pursuant to N.J.A.C. 7:26-9.1 et seq. for the calendar year covered by the report.
- iv. a summary of all manifest numbers for all hazardous waste received, identifying those shipments which were rejected in whole or in part and identifying those shipments where a discrepancy occurred.
- v. for each type of hazardous waste accepted, a report of the total quantity received and the quantities consigned to each treatment, recovery, or disposal process used. The report shall include the quantities of each waste type placed into storage and removed from storage during the reporting period.
- vi. monitoring data under N.J.A.C. 7:1-A-6 et seq. (Rules of the Division of Water Resources), where required.
 - vii. the most recent closure cost estimates under N.J.A.C. 7:26-9.8 and the most recent post-closure cost estimate under N.J.A.C. 7:26-9.9, where applicable.
- viii. a certification signed and dated by the owner or operator of the facility or his authorized representative stating "I certify under penalty of law that I have personally examined and am familliar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties under N.J.S.A. 7:1E-1 et seq. for submitting false information, including the possibility of fine and imprisonment."

EXEMPTIONS

If your hazardous waste activities are such that you no longer require TSD interim status from the USEPA, Region II, and no longer need to operate as an existing TSD facility under the NJDEP (see N.J.A.C. 7:26-1.4 et seq.) you may request in writing from the USEPA, Region II, to be removed from the TSD interim status facility list. Please advise this Bureau by letter of all your communications with the USEPA on any matters of reclassification of your facility.

JAN 27 JU 12 AM 183
ENVIRONMENT ROTECTION
AGENCY
NEW YORK, N.Y. 10007

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Call taken by

Carrie Barrell Activities

1/10/83-RETURN CALLTO ENVIRD Ron PANASIEWICZ -SAVAGE NO LONGER TSDF GEN RUTKUUSKI, 1 - 802 - TANK 49e #4 Fuel Oil - TANK GENCRATE - F-UC/ OIL-CAlcium phosphatEs -Oil Studge is only offsited -LAST Fine 2000 gAllows Every 3-4 30 DAYSE EXTGIVENTO
TO RESolve WITH PRICKETT - DEPTFORD GEANS OUT Slupge TANK. Advise US OF Results 1/10/83

Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO. 1500 Pine Street Camden, New Jersey 08103

January 11, 1983

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Erwin Rutkowski
New Jersey DEP
Division of Waste Management
32 E. Hanover Street
CN -027
Trenton, New Jersey 08525

Dear Mr. Rutkowski:

RE: TSD FACILITY ANNUAL REPORT

As a result of our discussion yesterday, Monsanto Company, Camden facility is requesting a correction of RCRA Interim Status Filing designation for a TREAT/STORE/DISPOSE activity. Attached is a letter to Mr. Thomas Paccone of the Region II, US EPA.

It is also our understanding that upon confirmation of the status change, the requirement to file a TSD Facility Annual Report would be waived.

With a need to change our status, you granted a 30 day extension from the January 7, 1983, notification date, with the understanding we would keep you informed of any delays which might develop.

If you have any questions or require further information, please call at (609) 963-0243.

Very truly yours,

MONSANTO COMPANY

R. P. Panasiewicz

Mfg. & Tech. Supervisor

RPP:ms

JAN 27 TU 12 AM '83
ENVIRONAL AGENCY
NEW YORK, N.Y. 10007

January 11, 1983

and the second of the second o

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

U. S. Environmental Protection Agency Region II Permits Administration Branch 26 Federal Plaza New York, New York 10007

Attn: Mr. Thomas Paccone

Re: EPA Identification Number NJD001700830 Correction of RCRA Interim Status Filing

Dear Mr. Paccone:

This is to advise you that Monsanto Company's EPA Form 8700-12 notification dated August 11, 1980, for its Camden, New Jersey location contains an unnecessary designation of a TREAT/STORE/DISPOSE activity in Item VI.C.

Please replace the incorrect notification with the enclosed corrected notification. As a result of this correction, the Monsanto facility located at Camden, New Jersey does not need a hazardous waste permit pursuant to RCRA. Therefore, please return the incorrect notification and the EPA Part A application for the Camden facility (EPA Form 3510-1) dated November 11, 1980, to me at the above address.

Very truly yours,

MONSANTO COMPANY

Plant Manager

DCD: ms

cc: Erwin Rutkowski

NJ DEP

Division of Waste Management

NSD001700836818

AIR&WASTE MAIL GEMENT

APR 26 | 30 PM 85

U.S. AL PROT. SY. Monsanto

1005 VEN 35 L. 3: 18

Garrette to

CC: 0111

MONSANTO INDUSTRIAL CHEMICALS CO. 1500 Pine Street Camden, New Jersey 08103

April 15, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Edward Stevenson N.J. Department of Environmental Protection Office of Science and Research CN 402 Trenton, New Jersey 08625

Dear Mr. Stevenson:

REFERENCE: TSCA SECTION 775.190 DIOXIN NOTIFICATION

In May 1980, the EPA promulgated a rule under 40 CFR, Part 775.190 of the Toxic Substance Control Act requiring all persons intending to dispose of 2,3,7,8 tetra chloro di benzo - P - dioxin, (TCDD) to notify the agency sixty days in advance of disposal.

In January 1985, the EPA promulgated a rule under the Resource Conservation and Recovery Act (RCRA) that list as hazardous certain wastes that contain chlorinated dioxins as acute hazardous wastes. Under these new requirements, all persons who previously notified the agency for generation of the listed dioxin wastes are required to notify the state authorized by the EPA to operate the hazardous waste program.

Monsanto Company, Camden Plant, currently has no plans to generate or dispose of 2,4,5-T, but with the regulation being again left for interpretation, Monsanto Company, Camden Plant, is submitting this notification under RCRA.

Should you have any questions or concerns, please contact R. P. Panasiewicz at 609-963-0243.

Very truly yours,

MONSANTO COMPANY

D. C. Dieterich Plant Manager

DCD:mt

cc: U. S. EPA - Region II

a unit of Monsanto Company

get a.

5-10

Please print or type	with ELITE type (12 characters/inch) in the unshaded areas only.	GSA No. 0246-EPA-OT
©EPA	NOTIFICATION OF HAZARDOUS WASTE ACTIVITY	INSTRUCTIONS: If you received a preprinte
INSTALLA- TION'S EPA I.D. NO.	The late of the process of the proce	label, affix it in the space at left. If any of the information on the label is incorrect, draw a ling through it and supply the correct information in the appropriate section below. If the label
I. STALLATION	removed to the property of the	complete and correct, leave Items I, II, and below blank. If you did not receive a preprint
INSTALLA- TION II. MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE	label, complete all items. "Installation" means single site where hazardous waste is generate treated, stored and/or disposed of, or a trar porter's principal place of business. Please ref
LOCATION III OF INSTAL- LATION	a 101 SG 105 2 W W G to the one of south or lightly seen and control to the United States of	to the INSTRUCTIONS FOR FILING NOTICATION before completing this form. To information requested herein is required by language (Section 3010 of the Resource Conservation and Recovery Act).
FOR OFFICIAL U		TEN PERMIT
Č I I I	COMMENTS	ППППППППППППППППППППППППППППППППППППППП
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	RANSPORTATION (transporters only – enter "X" in the appropriate	hox(es)
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	UBSEQUENT NOTIFICATION	1.1000年1000年1月20日)1月4
Mark "X" in the appr If this is not your firs	opriate box to indicate whether this is your installation's first notification of hat notification, enter your Installation's EPA I.D. Number in the space provided to	zardous waste activity or a subsequent notification below.
Π	NOTIFICATION TO A SUBSTITUTE OF THE STATE OF	C. INSTALLATION'S EPA I.D. NO.
	NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete ite	m(c) $N[J]D[0]0]1[7]0[0]8[3]$
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EPA Form 8700-12	6-80)	CONTINUE ON REVERS

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C. COMMERCIAL CHEMICA stance your installation has	AL PRODUCT HAZAF andles which may be a	RDOUS WASTES: Enter hazardous waste. Use ad	the four-digit number ditional sheets if necessa	from 40 CFR Part 261.3 ary.	3 for each chemical sub-
(7) 31	32	33	34	35	36
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D. LISTED INFECTIOUS W hospitals, medical and res	ASTES. Enter the fou earch laboratories your	r-digit number from 40 installation handles. Us	CFR Part 261.34 for ea e additional sheets if ne	ch listed hazardous waste cessary.	e from hospitals, veterinary
49	50	51	52	53	54
E. CHARACTERISTICS OF hazardous wastes your ins	NON-LISTED HAZA tallation handles. (See	RDOUS WASTES. Mark 40 CFR Parts 261.21 —	* "X" in the boxes corre	esponding to the characte	eristics of non-listed
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X. CERTIFICATION			The Share Market	· 特中 15 (表音樂生音	· 1234年 1342年
I certify under penalty attached documents, an I believe that the subm mitting false informatio	nd that based on my itted information is	inquiry of those inc true, accurate, and c	lividuals immediately complete. I am aware	responsible for obta	ining the information.
SIGNATURE		NAME & OF	FICIAL TITLE (type or	print)	DATE SIGNED
1/2/8/1.1	15	D. C. 1	Dieterich, P	lant Manager	4/16/85

REVISED

	The first first the second of
9/20/82	HWOMS MASTER FACILITY
REGION: 02 STATE: NJ	(NJD001700830) MONSANTO CO
EXISTANCE DATE: 10/01/82	1500 PINE ST CAMDEN 609/965/0243
COUNTY: CAMDEN	007 DISTRICT: BASIN: 3102
FACILITY STATUS: 1 MODIFY/CONSTRUCT	: COMMERCIAL: NON-REGULATED: OWN
MAILING ADDRESS SAVAGE RICHARD TECH SUPV 1500 PINE ST CAMBEN NJ	OWNER ADDRESS MONSANTO COMPANY 800 NORTH LINDBERGH BLVD 08103 ST LOUIS 314/694-1000
INDICATORS	NOTIFICATION DATA
CONFIDENTIALITY NOTIF : 0 CONRIDENTIALITY PART A : 0 NATURE BUSINESS IND : A MAP STATUS IND : A DRAWING STATUS IND : A PHOTO STATUS IND : A INDIAN LAND IND : N OWNER/OPERATOR IND : Y SIC CODES 2824 2816 2895 2819	PERMIT STATUS: 1 NOTIFICATION RECEIVED: 8/15/80 NOTIFICATION ACKNOWLEDGED: 10/09/80 PART A RECEIVED: 11/19/80 (1) PART A ACKNOWLEDGED: 1/15/81 (2) PART A ACKNOWLEDGED: TRANSPORTATION
WASTE CODE: DOO1 ESTIMATED AMOUNT:	WASTE DESCRIPTION 3.900 MT PROCESSES: SO2
The state of the s	COMMENTS
	451 810427 GEN 157 820310 ↔ 10.088

74 RORDSIEME

RCRA GENERATOR INSPECTION FORM

SENVIRONMENT OF ACTION TO THE OTION

RCRA GENERATOR INSPECTION FORM

COMPANY NAME: MONSANTO COMPANY

EPA I.D. NUMBER: NJD001700830

COMPANY ADDRESS: 1500 PINE STREET.

CAMBEN, N.J. 08104

COMPANY CONTACT OR OFFICIAL:

DICK SAVAGE

TITLE:

TECHNICAL SUPERVISOR

CHECK IF FACILITY IS ALSO A TSD FACILITY //

Check appropriate box:

INSPECTOR'S NAME:

ALBERT FRALINGER

BRANCH/ORGANIZATION:

NJ-DEP-SWA

DATE OF INSPECTION: 4-27-81

YES

DON'T KNOW

W

(1) Is there reason to believe that the facility has hazardous waste on site?

- a. If yes, what leads you to believe it is hazardous waste?
- Company admits that its waste is hazardous during the inspection.
- // Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- // The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- The waste material is listed in the regulations as a -hazardous waste from a specific source (§261.32)
- The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- Company is unsure but there is reason to believe that waste _materials are hazardous. (Explain)

	b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely
	products or raw materials?
	Please explain:
	c. Identity the hazardous wastes that are on-site, and estimate approximate quantities of each.
	GAILOUS. APPROXIMATERY 7800 Ibs OF OIL SLUDGES ARE
	LYCOZETL OH ZIJE'
	-d. Describe the activities that result in the generation -of hazardous waste. Setting of Socios 711 TANKS Containing
The summary has been developed the control of the c	orstillant of the the quot b. Frel oils
(2)	Is hazardous waste stored on site?
	a. What is the longest period that it has been accumulated?
	b. Is the date when drums were placed in storage marked on each drum?
(3)	Has hazardous waste been shipped from this facility since November 19, 1980?
	a. If "yes," approximately how many shipments were made?
*	TEST INAM THEMPIHE BUD.
. (4)	Approximately how many hazardous waste shipments off site have been made since November 19, 1980? ONE
~	a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?
	b. If "no" or "don't know," please elaborate.

en favi		the following information?
	-	- a manifest document number
	*	- the generator's name, mailing address, telephone number, and EPA identification number
		- the name, and EPA identification number of each transporter
,	*	- the name, address and EPA identification number of the designated facility and an alternate facility, if any: No ALTERNATE FACILITY GIVEN
PULL COMPANY	يائيودون ب ريد المخطور	of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle
		- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA
(5)		there any hazardous wastes stored on site at the time the inspection?
	a.	If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure?
	b.	If not properly packaged or in secure tanks, please explain.
	c.	Are containers clearly marked and labelled? - N/A
	d.	Do any containers appear to be leaking?
	e.	If "yes," approximately how many?

a. How do you know?

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments. Monsonto has 9 OIL TANKS ON SIJE, 6 SMAIL DAY TAUKS - FOR DAILY OPERATIONS, and 3 LARGE CAPACITY, MANUFACTURIUS ACTIVITIES ON SITE INCLUDE BOUF ASH AND MOULD COAT, ASYNTRETIC BONE ASH, QUO LAMPBLACK. The LATTER Being A RESult of incomplete COM Bustion OF FUEL OIL, LAMP BLACK'S CONTENT IS 9990 CARBON: The ACTUAL WASTE SEVERATED ON SITE ARE SOLIOS that SEHIE FROM the DIFFERENT GRADES OF OIL THESE ACCUMILATED SLUDGES CAN NOT BE CLEANED While the TAUKS ARE I'M SERVICE , REREFORE WASTE IS NOT Being Stores on site until the Aunilabre oil is up and the subject ARE READY TO pump out. Approximate YEARLY TOTAL OF GENERATED! HAZARDOUS WASTE is 8600 lbs. HE ONLY offer WASTE ON SITE IS their Accumilated Slugge From their Scrubber WATERS IN the LAMPBLACK OPERATIONS QUO FLOOR SWEEPINGS - INDUSTRIAL WASTE, BOTH ACCEPTABLE AT SAUITARY LANDFILLS PER APPROVAL NJ-DEPSWM. SEE
* The effective date for this requirement is March 1; 1982. (Accompanied Letters)

Air Pollution PERMITS
HELD BY MONSANTO CAMDEN FACILITY

EMISSIONS:

Lampblack off-gas is predominantly nitrogen, CO, and carbon particulates. Phos-Check manufacture liberates ammonia (incinerated), and both Phos-Chek and Bone Ash/Mould Coat produce product dust.

The plant has thirty permitted and non-permitted sources tabulated below:

Source Cor	ntrol Device	Permit No. Ex	pires
Lampblack Pack- ing D.C.	Bag House	P 16208	0/10/84
#3 Lampblack House	Bag House	None. Installati	
#4 & 5 Lamp- black House	Scrubber	н н	"
Bldg. 27 P/30 D.C.	Bag House	P 11634 12	2/13/83
Bldg. 33 Mill	Bag House	None. Installati	
Bldg 32 Blender	Bag House	P 34099 10	0/05/82
Bldg. 33 P/30 D.C.	Bag House	P 33227 10	0/04/82
Bldg. 33 Hoppers	Bag House	P 33227 10	0/04/82
Bldg. 31 Unload- ing Station	Bag House	P 34098 10	0/05/82
P/30 Oven Off-Gas	None	P 45172 Awaitin for 5 yr operati	
P/30 NH ₃ Oxidizer	Incinerator	P 10755 12	2/13/83
Bone Ash Kiln Off-Gas	Multiclones & Bag House	P 7952 4	/12/83
Bone Ash Milling	Bag House	P 12232 6	5/11/84
Mould Coat Drum Dryer	Scrubber	None. Installat	
Boilers (3)	None		"
Oil Storage Tanks (4)	None	P 29956 thru 3 P 29959	/28/82
Oil Storage Tanks (8)	None	None. Installat	
Oil Storage Tank	Conservation Vent	P 18645 5	/28/85

REPRESENTATIVE LAB RESUlts FOR WASTE STATUS

MONSONTO FLASH < 140° F - HAZARDOUS. N

Monsanto

LABORATORY ANALYSIS REPORT

SAMPLING DATE	TIME	DEPT.
3-17-81	_	
MATERIAL OF F	on Skinny TANK	6 / 21 =
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LABORATORY ANALYSIS REPORT

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STATE OF NEW JERSEY

DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY JOHN FITCH PLAZA, CN 027, TRENTON, N.J. 08625 SOLID WASTE ADMINISTRATION

March 12, 1981

Mr. R.W. Savage Monsanto Industrial Chemicals 1500 Pine Street Camden, New Jersey 08103

Dear Mr. Savage:

Pursuant to your request for disposal of Phoschek P30, Natural Bone Ash, and Mould Coat/Synthetic Bone Ash, please be advised that the wastes are classified as industrial waste (I.D. #27).

The waste may be disposed at any sanitary landfill authorized to accept industrial waste (I.D. #27).

The physical appearance of these wastes are fine white powders. The wastes will be disposed at a rate of 1,000 lbs/month each for a total of 3,000 lbs/month.

The original of this letter must be made available to the disposal facility operator. The letter is valid for one (1) year from the above date.

Should you have any further questions regarding this matter, please contact Timothy McGuinness of my staff at (609) 292-9877.

Very truly yours,

Ralph Pasceri Ralph Pasceri

Chief

Bureau of Hazardous Waste

RP:TM:ps

ACCUMILATER SCRUBBER SLUDGE.

MONSANTO - CAMDEN NJD001700830



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOLID WASTE ADMINISTRATION TRENTON, 08625

BEATRICE S. TYLUTKI

May 19, 1978

Mr. John T. Nolan Production Supervisor Monsanto Industrial Chemical Co. 1500 Pine Street Camden, New Jersey 08103

Re: Disposal of Lampblack

Dear Mr. Nolan:

Pursuant to your request I have reviewed submitted data concerning physiological effects of carbonblack (similar to Lampblack). Although certain polycyclic aromatic hydrocarbons may be adsorbed on Lampblack, the data of Nau et al clearly suggests that prolonged exposure to carbon black (C3H mice; monkeys) through ingestion, dermal application and inhalation produced no significant physiological effects. Further said material appeard to be substantially wetted, would probably not create dust problems, and would be quickly covered in a landfill site. Therefore, Lampblack residues are not considered special waste and do not require a Manifest.

Should you have any additional questions regarding this matter, please

contact me directly.

Ronald J Buchanan, Ph. D

Chief

Bureau of Hazardous & Chemical Wastes

RJB:hjg

YES

W

11. What is the approximate area of the

hazardous waste landfill?

^{*} Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT (§§265.340 and 265.379)

YES NO KNOW

What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?

2.	Was hazardous waste being incinerated or
• \	thermally treated during your inspection?
	If "YES", answer all following questions.
	If "NO", answer only questions 3 and 7.

3.	Has waste include:	analysis	been	perfor	med	(and	written	records	kept)	to	
	- heating	value of	the v	vaste	~						
	- halogen	content							_		
	- sulfur o	content									

- concentration of lead
- concentration of mercury

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here

- 4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?
- 5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:

 - air flow
 - incinerator temperature
 - scrubber ilow scrubber pH
 - relevant level controls
- -Every hour for:
 - stack plume (color and opacity)
 - 5. Is there open burning of hazardous waste?

If "YES", what is being burned? (only burning or detonation of explosives is permitted) If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others? DON'T KNOW NO 6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain. Is there any evidence of fugitive emissions? Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain. What types of air pollution control devices (if any) are installed on the incinerator? CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400) Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain. Is there a means to stop the inflow of continuously-fed hazardous wastes? Is there ignitable or reactive waste fed into the treatment system? If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how. Are the incompatible wastes placed in the same treatment process? If "YES", explain. Describe the treatment system at this facility.



Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO. 1500 Pine Street Camden, New Jersey 08103

January 11, 1983

CERTIFIED MAIL - RETURN RECEIPT REQUESTED Budgepad Company

U. S. Environmental Protection Agency Region II Permits Administration Branch 26 Federal Plaza New York, New York 10007

Mr. Thomas Paccone Attn:

Re: EPA Identification Number NJD001700830

Correction of RCRA Interim Status Filing

Dear Mr. Paccone:

This is to advise you that Monsanto Company's EPA Form 8700-12 notification dated August 11, 1980, for its Camden, New Jersey location contains an unnecessary designation of a TREAT/STORE/DISPOSE activity in Item VI.C.

Please replace the incorrect notification with the enclosed corrected notification. As a result of this correction, the Monsanto facility located at Camden,
New Jersey does not need a hazardous waste permit
pursuant to RCRA. Therefore, please return the incorrect
notification and the EPA Part A application for the Camden facility (EPA Form 3510-1) dated November 11, 1980, to me at the above address.

Very truly yours,

MONSANTO COMPANY

David C. Dieterich Plant Manager

DCD:ms

Erwin Rutkowski

NJ DEP

Division of Waste Management

a unit of Monsanto Company

NO. U246-EPA-UT

the fix		w	12 15 10
IX. DESCRIPTION OF HAZARDO	US WASTES (continued from	(ront)	and the second s
A. HAZARDOUS WASTES FROM NON waste from non-specific sources your	SPECIFIC SOURCES. Enter the	four-digit number from 40 CFR Par	261,31 for each listed hazardous
1 1 2		4	6
23 - 26 23 -		23 - 26 23 -	23 - 26
7		10	
B. HAZARDOUS WASTES FROM SPEC	IFIC SOURCES. Enter the four-o	ligit number from 40 CFR Part 261.3	2 for each listed hazardous waste from
specific industrial sources your installa	ition handles. Use additional sheets	if necessary.	
13	16	16 .17	
22 - 16 13 -		22 22	24
23 - 26 23	20 20	23 - 26 23 -	15 : 16
25 20	27	26 21	20
C. COMMERCIAL CHEMICAL PRODU	CT UA ZADDOUS WASTES Enter	the four-digit number from 40 CFF	Part 261.33 for each chemical sub-
stance your installation handles which	may be a hazardous waste. Use ad	ditional sheets if necessary.	
31 3	2 33	34 , 31	36
23 - 26	29 - 26	23 - 36	26 23 - 26
37 3	29	40	42
23 - 26	26 23 - 26	23 - 16 23 · 47	
hid hi			
	26 23 - 26	23 - 26 23 -	26 23 - 26
D. LISTED INFECTIOUS WASTES. En	ter the four-digit number from 40	CFR Part 261,34 for each listed haza	rdous waste from hospitals, veterinary
hospitals, medical and research labora		52 53	54
49 5			
		22 24 23	25 - 26
E. CHARACTERISTICS OF NON-LIST hazardous wastes your installation has	TED HAZARDOUS WASTES. Marindles. (See 40 CFR Parts 261.21 —	k "X" in the boxes corresponding to 261.24.)	the characteristics of non-listed
I IGNITABLE	2. CORROSIVE	DOS)	[0000]
(D001)			
X. CERTIFICATION I certify under penalty of law th	at I have personally evanded	and am familiar with the inform	nation submitted in this and all
attached documents, and that bas I believe that the submitted infor-	ed on my inquiry of those inc	iividuais immediateiv responsioi	g for obtaining the injormation,
I believe that the submitted informitting false information, including	g the possibility of fine and im	prisonment.	
SIGNATURE		FIGIAL TITLE (type or print)	DATE SIGNED
	Plan	t Manager	01/11/83
Mulera	D. C.	Dieterich	

I.D. - FOR OFFICIAL USE ONLY

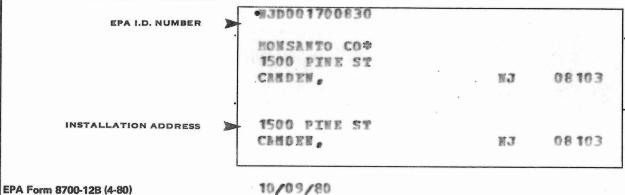
EPA Form 8700-12 (6-80) REVERSE

MONSANTO COMPANY, Camden, NJ NJD001700830

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	L. 196	

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 18, 2015 - 9:48 AM Version 5.0

User Selection Criteria

Location:

New Jersey, all activities

Activity Location:

None Chosen

Handler ID:

NJD001700830

Group of IDs:

None Chosen

Handler Name:

Handler Universe:

All Facilities Regardless of Universe

Region, State, Handler Name

Determined Date Range: From: 10/01/1980 To: 08/18/2015

Location County Code: None Chosen

Evaluation Type:

Location City:

Focus Area:

Location Zip Code:

State District:

Violation Type:

Sort Order:

None Chosen Display Code Descrip.: Yes

Display Universes:

Yes

Results

Data meeting the criteria you selected follows.

Total Pages:4

Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report; pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name:

cme foia.rdf

Developed by:

EPA Headquarters, Office of Enforcement and Compliance Assurance

Deployed: Last Updated:

June 2006 May 2012

Contact:

rcrainfo.help@epa.gov

Tables Used:

cmecomp3, ccitation3, hreport univ5, lu citation, lu state, hid groups

Libraries:

none

MONSANTO CO		Count	y Name / Code: CAM	IDEN / NJ007				NJD001700830
Location: 1500 PINE ST; CAMDEN, I Mailing: PENNSYLVANIA AVE; KEA								REGION 02
Activity Location: NJ	State District: SOUTHERN							
		Accessibility:	No	on-Notifier:		Extract Flag): Y	Active Site: N
Generator: N Short-Term Gen: N	Transporter: N Transfer Facility: N	Operating TSDF: Offsite Receiver:	N	IC In Place: HSM:	:	N N	El Indicator Subpart K:	(HE/GW)N/N
Full Enforcement: CA Wrkld: N Active State Gen: N	Converter: State TSDF:	State Unaddressed State Addressed State SNC w/Cor	SNC: N	EPA Addre	dressed SNC: ssed SNC: v/Comp Sched	N N	опран к.	
Evaluations With No Violations:			***************************************	PORSTOCKAPET DE CONTRACTOR CONTRA			M6000009 A	
CEI Evaluation 09/15/1987 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 005 Not Subtitle 0	Person: C: NO	R2DEP Day Zero:	Branch:		nd Violation: NO
NRR Evaluation 04/10/1985 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 004 Not Subtitle 0	Person: C: NO	Day Zero:	Branch:	Four	nd Violation: NO
NRR Evaluation 03/14/1984 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 002 Not Subtitle C	Person: C: NO	Day Zero:	Branch:	Four	nd Violation: NO
NRR Evaluation 02/02/1984 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 001 Not Subtitle C	Person: C: NO	Day Zero:	Branch:	Four	nd Violation: NO sus Area:
NRR Evaluation 01/26/1984 Citizen Complaint: NO	Activity Location: NJ Multimedia Inspection: NO	By: State Sampling: NO	Identifier: 003 Not Subtitle C	Person: O: NO	Day Zero:	Branch:		nd Violation: NO us Area:

Total Number of Handlers:

Total Number of Activity Locations:

1

^{*} End of Report *

^{*} Note: Penalty amount may not reflect all violations cited.

Report run on: August 18, 2015 - 9:48 AM

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
El Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

^{*} Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 18, 2015 - 9:48 AM

Description of codes used on the report:

Code	Description
В	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
С	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIE s suspected of	ER - indicates that the handler has been identified through a source other than Notification and of conducting RCRA-regulated activities without proper authority:
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
0	indicates that the handler is a former non-notifier.
Χ	indicates that the handler is a non-notifier.

Evaluation Type	Type Description	
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE	
NRR	NON-FINANCIAL RECORD REVIEW	

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^{*} Note: Penalty amount may not reflect all violations cited.